

Exhibit 36

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF NEW JERSEY

3
4 IN RE: JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
5 MARKETING, SALES PRACTICES,
AND PRODUCTS LIABILITY LITIGATION

6 THIS DOCUMENT RELATES TO:

7
8 PASQUALINA RAUSA,)
)
9 Plaintiff,)
) MDL NO. 16-2738
10 vs.) (FLW) (LHG)
)
11 JOHNSON & JOHNSON, et al.,) CASE NO.
) 3:20-cv-02947-FLW-LHG
12 Defendants.)

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15 WEDNESDAY, JANUARY 27, 2021
16 Remote deposition of Pasqualina Rausa,
17 conducted at the location of the witness in Ponte Vedra,
18 Florida, commencing at 12:58 p.m., on the above date,
19 before Dianne N. Sarkisian, Certified Shorthand Reporter
20 and Registered Professional Reporter.

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(via Zoom.)

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1 I got my period.

2 Q. Why do you believe that?

3 A. 'Cause I became very self-conscious of
4 smells and odors and I just wanted to feel fresh.

5 Q. Was there someone in your life that
6 recommended the product to you or how is it that
7 you came to use Johnson's Baby Powder to feel
8 fresh?

9 A. It was advertised. They advertised it
10 and they used it on babies. So I said, well, if
11 it's good for babies, it's good for me.

12 And I lived with babies in my family all
13 my life and it was used on the babies back then,
14 and so it was always there.

15 And, you know, you see advertisements
16 where they're putting it on babies and, you know,
17 it's making babies smell fresh and clean and, you
18 know, it's like, okay. I guess it's, you know...

19 Q. Oh, sorry. Were you finished?

20 A. I just felt that, you know, and the fact
21 that it was in my house all the time. I smelt it,
22 I felt it, and I liked it.

23 Q. And when you say it was in your house
24 all the time, tell me about that.

25 A. I had a sister who had six children.

1 Q. And by down below, are you referring to
2 the vaginal area?

3 A. Yes.

4 Q. Did the talcum powder perform as you
5 expected it to?

6 A. It did. I loved the way it felt. It
7 was always so soft and it smelled good and there's
8 a funny story about it because I remember going to
9 my niece's house and going up the steps and
10 somebody was fol- -- my niece was following behind
11 me and she said, "Oh, Aunt Pat, you always smell
12 so good," and the only thing I could think of was
13 the baby powder because, you know...

14 Q. Did you ever see advertising for
15 Johnson's Baby Powder?

16 A. Yes. I saw it, I guess, on television
17 where they would, you know, have babies and
18 sprinkle it on babies, you know, saying that it
19 would -- you know, changing diapers and stuff like
20 that. And then, like I said before, I had babies
21 in my house all the time and we used it all the
22 time so I just felt, oh, if it's safe enough for
23 the babies, then it's safe enough for me.

24 Q. Did those advertisements indicate that
25 it was safe to use on babies?

1 MS. MCGRODER: Object.

2 A. You want me to answer that?

3 BY MS. EMMEL:

4 Q. Yes, go ahead and answer.

5 A. They didn't show anything negative about
6 it, so I took for granted it was.

7 Q. So when you saw them applying, um, when
8 you saw the commercials where they were applying
9 baby powder to babies, did that make you feel it
10 was a safe product?

11 MS. MCGRODER: Object to form, leading.

12 A. Yes.

13 BY MS. EMMEL:

14 Q. Did you ever see anything or hear
15 anything prior to those advertisements in 2019
16 that indicated to you baby powder was unsafe?

17 A. No. The first time I heard that the
18 baby powder was unsafe was when I heard the news
19 program saying that there was litigation with
20 Johnson & Johnson and they found asbestos in baby
21 powder and it caused cancer.

22 Q. Did you ever see any warnings on the
23 baby powder bottle --

24 A. No.

25 Q. -- indicating that baby powder may cause